ORIGINAL

(17) pm

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK,

Plaintiff,

Civil No. 01-0764

v.

(Judge William W. Caldwell)

LARRY LIDGETT, et al.,

Defendants.

MAR 2 5 2002

DEFENDANTS HORN, MEYERS AND LIDEFETTS MOTION FOR A PROTECTIVE ORDER DEPUTY CLERK

Defendants Martin Horn, Robert Meyers, and Larry Lidgett, by and through their attorney, John J. Talaber, Assistant Counsel for the Pennsylvania Department of Corrections, hereby move this Honorable Court, pursuant to Fed.R.Civ.P. 26(c), for a protective order which would stay their obligation to respond to Plaintiff's Interrogatories (and future discovery requests) pending a decision on their Motion for Summary Judgment in the above-captioned action.

WHEREFORE, Defendants Horn, Meyers, and Lidgett, respectfully request this Honorable Court to issue a protective order that will stay their obligation to respond to Plaintiff's discovery requests pending a decision on their Motion for Summary Judgment.

Respectfully submitted, Office of General Counsel

BY:

John J! Talaber Assistant Counsel

Pa. Department of Corrections

55 Utley Drive

Camp Hill, PA 17011

(717) 731-0444

Attorney Id. No. 83279

Dated: March 25, 2002

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK,

Plaintiff, Civil Action No. 01-CV-0764

v.

(Judge William W. Caldwell)

LARRY LIDGETT, et. al.,

Defendants.

PROOF OF SERVICE

The undersigned hereby certifies that Defendants Horn, Meyers and Lidgetts' Motion for a Protective Order was served upon the person(s) in the manner indicated below.

Service by first-class mail addressed as follows:

James D. Young, Esquire William Clark, AY-5585

Lavery, Faherty, Young & Patterson, PC **SCI-Rockview**

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Dated: March 25, 2002